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6 Attorneys for Defendants,
TODD BALDINI, ABYGAIL BIRD,
7 LAWRENCE STUART GIRARD and
PAMELLA TEJADA
8

9 UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT

11
12 EXAMWORKS, LLC, a Delaware
limited liability company,

13 Plaintiff,

14 v.

15 TODD BALDINI, an individual,
16 ABYGAIL BIRD, an individual,
LAWRENCE STUART GIRARD,
17 an individual, PAMELLA TEJADA,
an individual, ROE
18 CORPORATION, and DOES 1
through 10,,

19 Defendants.
20

Case No. 2:20-cv-00920-KJM-DM
Assigned to Hon. Kimberly J. Mueller
Courtroom 3, 15th Floor

**STIPULATION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING
TO COMPLAINT**

Action Filed: May 4, 2020

21
22 THE PARTIES, THROUGH THEIR RESPECTIVE ATTORNEYS OF
23 RECORD, HEREBY STIPULATE AS FOLLOWS:

24 WHEREAS, Plaintiff ExamWorks, LLC (“Plaintiff”) filed a Complaint
25 against Defendants Todd Baldini, Abygail Bird, Lawrence Stuart Girard, and Pamella
26 Tejada (collectively “Defendants”) on May 4, 2020;

27 WHEREAS, Plaintiff obtained an Order for expedited discovery in this action;

28 WHEREAS, Defendants’ counsel accepted service of the Complaint on behalf

1 of Defendants on May 8, 2020 on the condition that Plaintiff agree to an extension
2 through July 7, 2020 for Defendants to file a responsive pleading;

3 WHEREAS, Defendant's responsive pleading is currently due on
4 May 29, 2020;

5 WHEREAS, the hearing on an order to show cause why a preliminary
6 injunction should not be granted was originally set for May 22, 2020;

7 WHEREAS, the Parties are currently preparing for a preliminary injunction
8 hearing and engaging in expedited discovery, including the inspection Defendants'
9 electronic devices and accounts;

10 WHEREAS, Defendants are individuals and believe that focusing their
11 resources on the foregoing activities and potential resolution of the action should be
12 its focus over the next 45 days; and

13 WHEREAS, this is the first extension with respect to Defendants' Responsive
14 Pleading;

15 IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES,
16 THROUGH THEIR RESPECTIVE ATTORNEYS that Defendants shall have a
17 39-day extension to file their responsive pleadings to Plaintiff's Complaint, so that
18 they are now due on July 7, 2020.

19 Dated: May 21, 2020

Orrick, Herrington & Sutcliffe LLP

21 By: /s/ Robert Shwarts

22 Robert S. Shwarts

23 Catherine Y. Lui

24 Nathan Shaffer

25 Johanna L. Jacob

26 Attorneys for Plaintiff,
27 EXAMWORKS, LLC

1
2 Dated: May 21, 2020

3
4 Ford & Harrison LLP

5 By: /s/ Daniel Chammas

6 Daniel B Chammas

7 David Cheng

8 Attorneys for Defendants,
TODD BALDINI, ABYGAIL BIRD,
LAWRENCE STUART GIRARD
and PAMELLA TEJADA

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11 ORDER

12 IT IS SO ORDERED that Defendants shall have a 39-day extension of time to
13 file their responsive pleadings to Plaintiff's Complaint, which are now due on July 7,
14 2020.

15 Dated: May 21, 2020.

16 
17 CHIEF UNITED STATES DISTRICT JUDGE